



CALIFORNIA BUILDING CODE (2006 IBC) PUBLIC PROPOSAL FORM

PLEASE SEE REVERSE FOR INSTRUCTIONS ON SUBMITTING PUBLIC PROPOSALS. PROPOSALS MUST COMPLY WITH THESE INSTRUCTIONS.

- 1) Indicate the format in which you would like to receive your Public Proposals Monograph (PPM), Report of the Hearing (ROH) and Final Action Agenda (FAA):

☒ Paper ☐ * CD ☐ *Download from ICC Website

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- 2) PLEASE TYPE OR PRINT CLEARLY: FORMS WILL BE RETURNED if they contain unreadable information.

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- 3) *Signature: _____ ☒ Signature on File (see over)

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- 4) Cost Impact: Indicate if this Proposal: ☐ will ☐ will not increase the cost of construction.

- 5) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym:

IBC

If you have also submitted a separate coordination change to another I-Code, please indicate the code: _____
(See back of this form for list of names and acronyms for the International Codes).

- 6) Revision to: ☐ Section _____ ☒ Table 1016.1 ☐ Figure _____

- 7) PROPOSAL Please check appropriate box:

☒ Revise as follows: ☐ Add new text as follows ☐ Delete and substitute as follows: ☐ Delete without Substitution(s):

Show the proposed NEW, REVISED or DELETED TEXT in legislative format: ~~Line through text to be deleted.~~
Underline text to be added.

TABLE 1016.1 CORRIDOR FIRE-RESISTANCE RATING

REQUIRED FIRE-RESISTANCE RATING (hours)

OCCUPANCY	OCCUPANT LOAD SERVED BY CORRIDOR	Without sprinkler system	With sprinkler system ^c
H-1, H-2, H-3	<u>Greater than 30</u> All	Not Permitted	1
H-4, H-5	Greater than 30	Not Permitted	1
A, B, E , F, M, S, U	Greater than 30	1	0 1
R	Greater than 10	1	0.5 1
I-2 ^a <u>E</u> , I-4	All	Not Permitted	0 1
I-1, I-2 ^a , I-3	<u>Greater than 10</u> All	Not Permitted	1 ^b

a. For requirements for occupancies in Group I-2, see Section 407.3

b. For a reduction in the fire-resistance rating for occupancies in Group I-3, see Section 408.7

c. Buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.4.2 where allowed.

☐ PROPOSAL *Continued* (Attach additional sheets as necessary)

8) SUPPORTING INFORMATION (State purpose and reason, and provide substantiation to support proposed change):

This proposed amendment reinstates the one hour fire resistance rating requirement for corridors in all occupancies to be consistent with Section 1004.3.4.3 Construction of the 1997 UBC.

The 2006 International Building Code allows the use of non-fire resistance rated corridors (less than 1-hour fire resistance rating) to a much greater extent than the 1997 Uniform Building Code (UBC) currently adopted by California. In many cases the required 1-hour fire resistance rating for corridors is traded-off for the installation of an automatic sprinkler system. We do not believe that such trade-offs are appropriate where life safety is concerned. In such cases, it is advantageous and desirable to maintain the built-in passive fire resistant protection, as well as to provide the active automatic sprinkler system protection, where life safety is involved. In our opinion, trade-offs are entirely inappropriate where life safety is concerned. We believe that a balanced approach should be used to assure that the appropriate level of life safety will be provided to the occupants of the building who must rely upon the corridors to exit the building.

A secondary benefit of 1-hour fire resistance rated corridors is that they also assist fire fighters in doing their job by providing a protected means of access to the interior of the building where they can perform their search and rescue missions, as well as fire fighting operations, in relative safety. Fire resistance rated corridors can provide fire fighters with additional time to do their jobs more effectively and safely.

It should also be pointed out that where 1-hour corridors are eliminated in the IBC, the separation of the elevator hoistway from the corridors is also eliminated. This is unacceptable since smoke can readily travel through the hoistway, contaminating corridors on floors remote from the fire floor.

We strongly believe that sprinkler trade-offs should not be allowed for means of egress components. At present, neither the UBC nor the IBC allow sprinkler trade-offs for the fire resistance ratings required for exit stair enclosures, horizontal exits, and exit passageways. So why should sprinkler trade-offs be allowed for the 1-hour fire resistance rating of corridors which provide a protected egress path giving access to these exit elements?

Furthermore, other sprinkler trade-offs related to the means of egress in buildings have already been provided for in the IBC. For example, travel distance is allowed to be increased where automatic sprinkler systems are provided. The separation of exits (remoteness) is also allowed to be reduced where automatic sprinkler systems are installed. Interior finish requirements are relaxed within corridors where Class C interior finish can be used in lieu of Class B interior finish and Class B interior finish can be used where Class A interior finish would otherwise be required if not for the installation of automatic sprinklers. And in certain occupancies dead end corridors are allowed to be increased in length by as much as 150%, i.e. from 20 feet to 50 feet, where automatic sprinkler systems are provided.

We are concerned that the compounding effect of sprinkler trade-offs could lead to greater risk to the life safety of the building occupants, especially if combined with a reduction in or the elimination of the 1-hour fire resistance rating for corridors providing access to the exits or the exit stairs. Too much reliance on automatic sprinkler systems may not be wise where life safety is a key consideration. We strongly believe that a balanced approach to fire and life safety in buildings should be provided to greatly enhance the probability that the intended level of fire and life safety prescribed by the building code will be provided when a fire occurs, even if something should go wrong.

We acknowledge that automatic sprinkler systems are an important fire protection tool, but they are not infallible. Like any mechanical system, they are subject to failure. In fact, a recent statistical analysis of automatic sprinkler system performance conducted by the NFPA has concluded that automatic sprinkler systems fail to activate in at least 1 out of every 6 fires that occur in sprinklered buildings. In our opinion such a level of performance does not justify trading-off built-in fire resistant protection for the means of egress in buildings where the occupant's lives are at risk in a fire emergency. A balanced design approach of providing built-in fire resistive protection in conjunction with automatic sprinkler protection, in our opinion, will go a long way toward assuring that the level of fire and life safety intended by the building code will be delivered during a fire emergency.

☐ SUPPORTING INFORMATION *Continued* (Attach additional sheets as necessary)